

## REMARKS

The Examiner's Action mailed on Nov. 28, 2006 has been received and its contents have been carefully considered. In this Amendment, Applicant has amended independent claims 1 and 14 to further define certain aspects of those claimed embodiments. The amended features are clearly described in the original application, including the drawings, so no new matter has been introduced to the application. Claims 1 and 14 are the independent claims, and all claims remain pending in the application. For at least the following reasons, it is submitted that this application is in condition for allowance.

Applicant has also made certain cosmetic amendments to the specification.

Turning now to the substantive rejections, the Office Action has rejected claims 1, 3, 4, 5, 6, 8, and 11 as allegedly anticipated by *Yamane* (US 2006/0061556). In dependent claim 1 has been amended, and it is submitted that the amended claim is patentably distinguishable over the cited reference for at least the following reasons.

It is well established that a reference may anticipate a claim within the purview of 35 U.S.C. § 102 only if all the features and all the relationships recited in the claim are taught by the reference structure either by clear disclosure or under the principle of inherency.

Amended independent claim 1 defines a keyboard module comprising a carrier device, a keyboard, and a navigator button. The keyboard for entering text message is mounted on the carrier device. The keyboard includes a plurality of keys arranged as a rectangular array, and **a plurality of intersection regions** disposed therebetween. The navigator button is mounted on the carrier device and located

within the keys of the keyboard. **The navigator button is disposed at one of the intersection regions.**

Specifically, claim 1 is amended herein to further define: "a keyboard for entering text message, the keyboard being mounted on the carrier device and including a plurality of keys arranged as a rectangular array, and a plurality of intersection regions disposed therebetween; and a navigator button mounted on the carrier device and located within the keys of the keyboard, wherein the navigator button is disposed at one of the intersection regions." Simply stated, *Yamane* fails to disclose or even suggest these claimed features.

*Yamane* disclose that a cell phone includes twelve keys 55, a cross-shaped operating key 67, and four keys 57 labeled "I", "E", "O", and "U" respectively. Twelve keys 55 are arranged in a matrix of 3 columns x 4 rows in region 53. The cross-shaped operating key 67 functioning as a scroll-key is arranged in another region 56. Four keys 57 are used to express four vowels are arranged in region 56, which is different from region 53, and are located at four corners of cross-shaped button 67 (see paragraph [0036] & FIG. 1).

In contrast to the claimed features, the twelve keys 55 are arranged as a rectangular array between which a plurality of intersection regions are disposed. However, the cross-shaped button, relied upon by the Office Action as allegedly teaching the navigator button of the claimed embodiments, is not disposed at one of the intersection region between twelve keys 55. If the four keys 57 labeled four vowels were arranged as a rectangular array, no more than one intersection regions at best could be generated. Neither twelve keys 55 nor four keys 57 disclose the keys of the claimed embodiments within which the navigator button is located. Accordingly, *Yamane* fails to disclose that the keyboard includes a plurality of keys

arranged as a rectangular array between which a plurality of intersection regions disposed, and that the navigator button is disposed at one of the intersection regions.

It is therefore submitted that Applicant's independent claim 1, as well as the claims 2-13 dependent therefrom, are not anticipated by (or rendered obvious by) the cited reference. As such, the rejection should be withdrawn.

The Examiner has rejected claims 14-22 as being unpatentable over *Yamane* (US 2006/0061556) in view of *Miller* (US 4,974,183). Claim 14 has been amended so that the amended claim 14 includes limitations similar those defining limitations of claim 1. Accordingly, independent claim 14 defines over the cited art for reasons similar to claim 1 (set forth above). As claims 15-22 depend from claim 14, these claims define over the cited art for at least the same reasons.

In addition, the Office Action stated that it would have been obvious to one of ordinary skill in the art at the time the invention was made to have the QWERTY keyboard, as taught by *Millar*, in the device of *Yamane*. However, *Yamane* discloses that numerals "0"~"9", "\*" and "#" are each assigned to the center of the surface of a key 55, and that two different phonetic letters are assigned at two ends of each keys except for the key labeled "#". Since eleven keys 55 cannot accommodate all 26 phonetic letters (see paragraph [0036]), so that four more keys, i.e. keys 57, must be added to the keyboard. Accordingly, the occupied size of the keyboard module of *Yamane* is increased, and that is contrary to the purpose of the claimed invention. If proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984)

As such, it is submitted that Applicant's independent claim 14, as well as the claims 15-22 dependent therefrom, are not anticipated by (or rendered obvious by) the cited reference. As such, the rejection should be withdrawn.

Based on the above, it is submitted that the application is in condition for allowance and such an allowance notice is earnestly solicited.

Should the Examiner feel that a conference would help to expedite the prosecution of the application the Examiner is hereby invited to contact the undersigned counsel to arrange for such an interview.

No fee is believed to be due in connection with this submission. If, however, any fee is believed to be due, you are hereby authorized to charge any such fee to deposit account No. 20-0778.

Respectfully Submitted,

**THOMAS, KAYDEN, HORSTEMEYER  
& RISLEY, L.L.P.**

/Daniel R. McClure/

By:

---

**Daniel R. McClure, Reg. No. 38,962**

100 Galleria Parkway, Suite 1750  
Atlanta, Georgia 30339  
770-933-9500